

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>ISIDRO FLORES TEXIDOR,</b> a/k/a "Tex"	<b>:</b>	<b>VIOLATIONS:</b> 18 U.S.C. § 371 (conspiracy to possess counterfeit checks - 1 count) 18 U.S.C. § 513(a)(possession of counterfeit checks - 3 counts) 18 U.S.C. § 2 (aiding and abetting)

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. TempStar Staffing ("TempStar") was a temporary employment agency located at 4411 5<sup>th</sup> Street Highway in Temple, Pennsylvania, and engaged in business which affected interstate commerce.

2. Mid-American Security Service, Inc. and Area Wide Protective ("Mid-American") was a business located at 2641 South Arlington Road, Akron, Ohio, engaged in business which affected interstate commerce.

3. From in or about July 2003 through in or about August 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

**ISIDRO FLORES TEXIDOR,**  
a/k/a "Tex,"

conspired and agreed with others known to the grand jury to commit an offense against the United States, that is, with intent to deceive, to possess and utter counterfeit securities of an organization, that is, counterfeit checks, in order to obtain cash, in violation of Title 18, United States Code, Section 513(a).

#### **MANNER AND MEANS**

4. It was part of the conspiracy that defendant ISIDRO FLORES TEXIDOR possessed and passed numerous counterfeit checks allegedly issued by TempStar and Mid-American for the purpose of obtaining cash.

It was further part of the conspiracy that:

5. Defendant ISIDRO FLORES TEXIDOR created and produced numerous counterfeit checks using computers and blank check paper.

6. Defendant ISIDRO FLORES TEXIDOR directed and drove several females to various business locations in Berks County and Lehigh County, Pennsylvania, for the purpose of passing these counterfeit checks and obtaining cash.

7. Defendant ISIDRO FLORES TEXIDOR paid the females who passed the counterfeit checks with cash proceeds received from cashing the checks.

8. As a result of passing the counterfeit checks, defendant ISIDRO FLORES TEXIDOR fraudulently obtained approximately \$24,994 in cash.

## **OVERT ACTS**

In furtherance of the conspiracy, defendant ISIDRO FLORES TEXIDOR, and others known to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about July 25, 2003, defendant ISIDRO FLORES TEXIDOR made and possessed counterfeit checks dated July 25, 2003, purportedly issued by TempStar, drawn on First Union Bank, being checks numbered 39471, 39472, 39474, 39478, 39479 and 39481.

2. From on or about July 30, 2003 through on or about August 1, 2003, defendant ISIDRO FLORES TEXIDOR distributed these checks to a female known to the grand jury and instructed her to cash these counterfeit checks at various business locations in Berks County, Pennsylvania.

3. On or about July 31, 2003, defendant ISIDRO FLORES TEXIDOR made and possessed counterfeit checks dated July 31, 2003, purportedly issued by TempStar, drawn on First Union Bank, being checks numbered 39482, 39483, 39484, and 39487.

4. From on or about August 1, 2003 through on or about August 11, 2003, defendant ISIDRO FLORES TEXIDOR distributed these checks to a female known to the grand jury and instructed her to cash these counterfeit checks at various business locations in Berks County, Pennsylvania.

5. On or about August 8, 2003, defendant ISIDRO FLORES TEXIDOR

made and possessed counterfeit checks dated August 8, 2003, purportedly issued by Mid-American drawn on National City Bank, being checks numbered 39518, 39520, 39521 and 39522.

6. From on or about August 12, 2003 through on or about August 15, 2003, defendant ISIDRO FLORES TEXIDOR distributed these checks to a female known to the grand jury and instructed her to cash these counterfeit checks at various business locations in Allentown, Pennsylvania.

7. On each date in which a female cashed one of the counterfeit checks at the instruction of defendant ISIDRO FLORES TEXIDOR, the defendant paid the female in cash with a portion of the proceeds from the cashed counterfeit check.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

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**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 2 and Manner and Means paragraphs 4 through 8 of Count One are incorporated here.
2. From on or about August 8, 2003 through on or about August 15, 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

**ISIDRO FLORES TEXIDOR,  
a/k/a "Tex"**

with intent to deceive, knowingly made, possessed, and uttered, and aided and abetted the making, possession and uttering of, a counterfeit security of an organization operating in and affecting interstate commerce, that is, a counterfeit check dated August 8, 2003, purportedly issued by Mid-American Bonding and Security Service, Inc., 2641 Arlington Road, Akron, Ohio, drawn on National City Bank, payable to Maria M. McKoy, check no. 39518, in the amount of \$4,674.20.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 2 and Manner and Means paragraphs 4 through 8 of Count One are incorporated here.
2. From on or about August 8, 2003 through on or about August 15, 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

**ISIDRO FLORES TEXIDOR,  
a/k/a "Tex"**

with intent to deceive, knowingly made, possessed, and uttered, and aided and abetted the making, possession and uttering, of a counterfeit security of an organization operating in and affecting interstate commerce, that is, a counterfeit check dated August 8, 2003, issued by Mid-American Bonding and Security Service, Inc., 2641 Arlington Road, Akron, Ohio, drawn on National City Bank, payable to Maria M. McKoy, check no. 39520, in the amount of \$4,674.20.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT FOUR**

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**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 2 and Manner and Means paragraphs 4 through 8 of Count One are incorporated here.
2. From on or about August 8, 2003 through on or about August 15, 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

**ISIDRO FLORES TEXIDOR,  
a/k/a "Tex"**

with intent to deceive, knowingly made, possessed, and uttered, and aided and abetted the making, possession and uttering, of a counterfeit security of an organization operating in and affecting interstate commerce, that is, a counterfeit check dated August 8, 2003, issued by Mid-American Bonding and Security Service, Inc., 2641 Arlington Road, Akron, Ohio, drawn on National City Bank, payable to Maria M. McKoy, check no. 39521, in the amount of \$4,674.20.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
United States Attorney